SUBMISSION OF JOINT RULE 26(F) REPORT AS TO DEFENDANT SME

Document 67

Filed 06/13/25

Page 1 of 5 Page ID

Clase 2:24-cv-04639-SPG-PVC

Plaintiff Chanaaz Mangroe, p/k/a Channii Monroe, and Defendants Terius Gesteelde-Diamant, p/k/a The Dream, Contra Paris, LLC, and Sony Music Entertainment ("SME") (collectively, the "Parties"), by and through their respective counsel, stipulate and agree as follows:

WHEREAS, the Court granted with leave to amend SME's motion to dismiss Plaintiff's First Amended Complaint, *see* Dkt. 58;

WHEREAS, Plaintiff timely filed her Second Amended Complaint (Dkt. 59) on May 14, 2025; SME's Motion to Dismiss that complaint is due on or before June 25 (*see* Dkt. 62); and the hearing on that motion is set for September 10, *see id.*;

WHEREAS, the Court ordered a Scheduling Conference on July 9, 2025 and the filing of a Joint Rule 26(f) Report, *see* Dkt. 64;

WHEREAS, the Parties have conferred regarding a request by SME to defer its Rule 26 obligations until this Court's ruling on SME's forthcoming motion to dismiss the Second Amended Complaint, given the possibility that the claims against SME may be dismissed without further leave to amend;

WHEREAS, there is good cause for this joint request, which is not made for the purpose of delay. Specifically, postponing initial Rule 26 obligations relating to the claim against SME will conserve judicial and party resources pending what may be a dispositive ruling relating to that claim, but discovery as to the claim against the other Defendants can proceed in the ordinary course;

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE, SUBJECT TO THE APPROVAL OF THE COURT:

1. SME's participation in the Scheduling Conference on July 9, 2025 and submission of the Joint Rule 26(f) Report is deferred until after the Court's ruling on SME's forthcoming motion to dismiss the Second Amended

Document 67

Filed 06/13/25

Page 3 of 5 Page ID

Clase 2:24-cv-04639-SPG-PVC

28

Document 67

#:639

Filed 06/13/25 Page 4 of 5 Page ID

Case 2:24-cv-04639-SPG-PVC

## **ATTESTATION OF CONCURRENCE IN FILING**

Pursuant to Local Rule 5-4.3.4 of the United States District Court for the Central District of California, I attest that Counsel for Plaintiff and Counsel for Defendant have authorized the filing of this document.

/s/ Kristin A. Linsley

Kristin A. Linsley